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January 10, 2020

## **VIA E-MAIL AND U.S. MAIL**

Christopher J. McCool, Esquire Joye Law Firm 5861 Rivers Avenue North Charleston, SC 29406

Brooklyn A. O'Shea, Esquire O'Shea Law Firm 1120 Folly Road Charleston, SC 29412

Re:

In the matter of the Complaint of MORAN ENVIRONMENTAL RECOVERY, LLC, as

the owner of the vessel "Miss June" and her engines, tackle, appurtenances, etc.

C/A No. 2:18-cv-02396-DCN / Our File No. 1467.03

Claimants: The Estate of Edward Roland Barnett and The Estate of David W. Rafferty

## Dear Chris and Brook:

I am writing to check the status of receiving the Barnett Estate's responses to Plaintiff-in-Limitation's First Set of Interrogatories and First Requests for Production of Documents. The same were served on you via U.S. mail on February 21, 2019. I request that you submit your responses within seven (7) days of this letter. This letter serves as our effort to resolve a discovery issue prior to filing a motion.

If you have any questions, please give us a call.

With kind regards, I am

Paul F. Tecklenburg

Sincerely,

PFT/slb